



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 10, 2019

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: ***United States v. Martha Patricia Bustos, 19 Cr. 482 (PGG)***

Dear Judge Gardephe

On or about June 28, 2019, the defendant in this case pled guilty pursuant to a cooperation agreement, before the Honorable Gabriel Gorenstein. At the time of the defendant's plea, the case was sealed, and docketing delayed, because it was anticipated that the Government would charge and arrest others based, in part, on Bustos' cooperation. Earlier today, FBI agents arrested one of Bustos' co-conspirators in California, and an indictment was unsealed charging that defendant and identifying Bustos as a co-conspirator. Accordingly, the Government respectfully submits that this case should be unsealed and filed on the public docket. Defense counsel has no objection to this request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney
Southern District of New York

/s/ Edward Imperatore

Edward Imperatore/Brendan Quigley
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Paul G. Gardephe

SO ORDERED

cc: Peter Till, Esq.

7/11/19

